

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

M CORP DBA 11:59,	:	
	:	Civil Action: 1:24-cv-01823
Plaintiff,	:	
	:	
v.	:	<b>SUPPLEMENTAL CERTIFICATION OF</b>
	:	<b>STACY LANDAU, ESQ. IN FURTHER</b>
INFINITIVE, INC., JOSEPH	:	<b>SUPPORT OF ORDER TO SHOW CAUSE</b>
BRADLEY SHERIDAN, AND DOES 1-	:	<b>AND TEMPORARY RESTRAINING</b>
25, INCLUSIVE.	:	<b>ORDER</b>
	:	
Defendants.	:	
	:	

I, STACY LANDAU, hereby certify as follows:

1. I am an attorney at law of the State of New Jersey and Counsel with the law firm of Nukk-Freeman & Cerra, P.C., counsel for M Corp dba 11:59 (“Plaintiff” and/or “11:59”)
2. I submit this certification in further support of 11:59’s application for a preliminary injunction and temporary restraining order against 11:59’s former employee, Defendant Joseph Bradley Sheridan (“Sheridan”), and Sheridan’s new employer Infinitive, Inc. (“Infinitive”) (collectively “Defendants”). I am fully familiar with the facts set forth herein.
3. On Monday, October 14, 2024, at 3:29 p.m., I received an iManage Share notification providing a link to a folder named “Google Drive Files.” Defendant Sheridan’s attorneys purported the “Google Drive Files” link would permit access to a password protected folder containing 11:59’s confidential information that Sheridan stored or accessed in his personal Google Drive after his resignation from 11:59.
4. Shortly thereafter, through the link provided, we were able to access and download the “Google Drive Files” in the form of a Zip file. The Zip file contained approximately 3.94 Gigabytes of data comprised of the following folder and file listing:

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📁 AWS <b>Project J</b>	📁 AWS ER service	📁 AWS FuzzySearchDDB
📁 Blockchain	📁 Certs	📁 Code Samples
📁 Databricks	📁 OnBoarding	📁 Performance Mgmt
📁 Strategy	📁 WhenLeave	📄 2024 Accomplishments.docx
📄 Business Requirements Document Template.do...	📄 DaaS.pptx	📄 Data Strategy.pptx
📄 System Design Document Template.docx		

5. By the next morning, on Tuesday, October 15, 2024, this office provided the “Google Drive Files” Zip file via secure link to Maragell for analysis.

6. On October 15, 2024, this office caused to be filed a Verified Complaint and Order to Show Cause seeking Temporary Restraints and supporting documents.

7. Without divulging attorney client privileged or work product privileged information, 11:59 did not discover the significant information it now submits prior to the filing of its Verified Complaint and Order to Show Cause.

I certify that the foregoing statements made by me are true and correct to the best of my knowledge. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

NUKK-FREEMAN & CERRA, P.C.  
*Attorneys for Plaintiff M Corp dba 11:59*



By: \_\_\_\_\_

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Dated: October 28, 2024